

**CHAITMAN LLP**

465 Park Avenue  
New York, New York 10022  
Phone & Fax: (888) 759-1114  
Helen Davis Chaitman  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)

*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

ZIESES INVESTMENT PARTNERSHIP,  
MARSHALL ZIESES, DEBRA S. ZIESES, NEIL  
R. ZIESES, CARYN ZIESES, BARRY INGER,  
ALLAN INGER, and SUSAN B. ALSWANGER,

Defendants.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

Adv. Pro No. 10-04669 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'  
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28  
U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants, Zieses Investment Partnership, Marshall Zieses as general partner of Zieses Investment Partnership, Debra S. Zieses as general partner of Zieses Investment Partnership, Neil R. Zieses as general partner of Zieses Investment Partnership, Caryn Zieses as general partner of Zieses Investment Partnership, Barry Inger as general partner of Zieses Investment Partnership, Allan Inger as general partner of Zieses Investment Partnership, and Susan B. Alswanger as general partner of Zieses Investment Partnership, (“Defendants”).

1. I submit this Declaration in support of Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 1, 2010.

3. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants’ Answer and Affirmative Defenses, dated January 17, 2014.

Dated: New York, New York  
April 3, 2020

/s/ Helen Davis Chaitman  
Helen Davis Chaitman